

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA )  
v. )  
RANDALL CRATER, )  
Defendant )  
Criminal No. 19-10063-DJC

## **STIPULATIONS**

Counsel for the United States and counsel for the Defendant have agreed to the following stipulations, which are herein proposed to the Court in a form suitable for presentation to the jury. These facts are taken from a previous filing by the defendant's counsel in a civil action. *See* Defendant Randall Crater's Answer to the Amended Complaint, 18-cv-10077-RWZ, ECF No. 113.

## I. STIPULATIONS REGARDING AUTHENTICITY OF DIGITAL EVIDENCE

In lieu of live testimony or other evidence at trial, counsel for the United States and counsel for Mr. Crater have stipulated that Mr. Crater has previously made the following statements:

- Mr. Crater was “the managing member and CEO” of Greyshore LLC.
- Mr. Crater “text[ed] one or more owners of digital currency in the name of My Big Coin”.
- Mr. Crater “owned My Big Coin (MBC) digital currency coins and sold some of his MBC coins to individuals who paid Mr. Crater by wiring funds to his designated payees”, including transfers to “accounts in the names of Greyshore Advertisement” and “Barbara Crater Meeks”.
- Mr. Crater “spent money he earned from sales of digital currency he owned” and “caused funds from his sale of digital currency he owned to be transferred from one bank to another”.
- My Big Coin, Inc. “was a Nevada corporation”
- Mr. Crater’s mother is “Barbara Crater Meeks”.

- Mr. Crater's wife is "Erica Crater".

\* \* \*

Counsel for the United States and counsel for Mr. Crater further stipulate and agree that if necessary, the party offering these stipulations could have (i) called at least one witness who would testify as to each of the above-identified facts and/or (ii) provide a certificate of authenticity of domestic records pursuant to Federal Rules of Evidence 902(11) and 902(13).

Counsel for Defendant

By: /s/ Scott Lopez  
SCOTT LOPEZ

Counsel for the Government

By: /s/ Christopher J. Markham  
CHRISTOPHER J. MARKHAM  
Assistant United States Attorney